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Attorneys for Plaintiffs UMG Recordings, Inc.; Capitol Records, LLC; Concord Bicycle Assets, LLC; CMGI Recorded Music Assets LLC; Sony Music Entertainment; and Arista Music

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

UMG RECORDINGS, INC., CAPITOL
 RECORDS, LLC, CONCORD BICYCLE
 ASSETS, LLC, CMGI RECORDED MUSIC
 ASSETS LLC, SONY MUSIC
 ENTERTAINMENT, and ARISTA MUSIC

Plaintiffs,

vs.

INTERNET ARCHIVE, BREWSTER
 KAHLE, KAHLE/AUSTIN FOUNDATION,
 GEORGE BLOOD, and GEORGE BLOOD,
 L.P.

Defendants.

) Case No.: 3:23-cv-06522-MMC

) **Plaintiffs' Notice of Motion to Compel**
) **Discovery**

) **Date:** December 12, 2024

) **Time:** 9:30 a.m.

) **Courtroom:** B

) **Judge:** Mag. Judge Laurel Beeler

NOTICE OF MOTION**TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE THAT ON Thursday, December 12, 2024 at 9:30 a.m., or as soon thereafter as counsel may be heard, in Courtroom B, located in the Philip Burton Federal Building and United States Courthouse, 450 Golden Gate Avenue, San Francisco, California 94102, pursuant to Rule 37(a) of the Federal Rules of Civil Procedure and N.D. Cal. Local Rule 37-2, Plaintiffs UMG Recordings, Inc., Capitol Records, LLC, Concord Bicycle Assets, LLC, CMGI Recorded Music Assets LLC, Sony Music Entertainment, and Arista Music (“collectively, “Plaintiffs”) move the Court to compel Defendants Internet Archive (“IA”), Brewster Kahle (“Kahle”), George Blood (“Blood”), and George Blood L.P. (“GBLP”) to produce several important categories of documents and information in response to Plaintiffs’ First Set of Requests for Production (“RFP”) to Defendants and Plaintiffs’ First Set of Interrogatories to Internet Archive (“ROGs”), as detailed in Plaintiffs’ Motion to Compel Discovery and accompanying declaration. ECF Nos. 127-128.

Dated: November 12, 2024

Respectfully submitted,

/s/ Danae Tinelli

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